

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

CHARLES GREENWOOD,

On Behalf of Himself and All Others Similarly
Situated,

Plaintiff,

v.

**EXPRESS TECHNOLOGIES LTD. f/k/a
EXPRESS VPN INTERNATIONAL LTD.,**

Defendant.

Case No.: 1:25-cv-08121

UPDATED STATUS REPORT

Pursuant to the court's November 3, 2025 Order (ECF No. 28), the parties jointly write to inform the Court on the progress of fact discovery and whether the parties believe a settlement conference would be fruitful at this time.

I. FACT DISCOVERY

On October 2, 2025, Plaintiff served his first set of requests for production and first set of interrogatories. On October 17, 2025, Plaintiff served his second set of interrogatories. Per agreement, Defendant responded to all three sets on December 3, 2025.

The parties met and conferred by videoconference over Defendant's discovery responses on December 5 and 11, 2025, and have agreed that Defendant will at this time prioritize production of documents and information relating only to Plaintiff Greenwood's individual claims. The parties met and conferred by videoconference regarding Defendant's objections and responses with respect to Plaintiff Greenwood's individual claims on January 12, 2026. The parties are in the process of determining whether all their disputes can be resolved without involving the Court.

The parties are currently negotiating a Confidentiality Order based on the Model Confidentiality Order set forth in the Local Rules for the Northern District of Illinois and anticipate submitting a proposed order shortly.

II. SETTLEMENT CONFERENCE

A decision on Defendant's anticipated motion to dismiss and/or compel arbitration will inform the parties' settlement positions. Accordingly, the parties do not believe that a settlement conference would be fruitful at this stage.

By: /s/ Nicolas G. Keller

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